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June 4, 1992

Our File: 04982/006001

**HAND DELIVER**

Ms. Donna R. Searcy  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

Re: Comments of Interactive Technologies, Inc.  
ET Docket No. 92-9

Dear Ms. Searcy:

Enclosed for filing on behalf of Interactive Technologies, Inc., please find an original and nine (9) copies of comments in the above-captioned Notice of Proposed Rule Making proceeding.

If you have any questions with regard to the enclosed please do not hesitate to contact the undersigned.


Very truly yours,

  
Terry G. Mahn

TGM/bab  
Enclosures

c: Interactive Technologies, Inc.

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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Redevelopment of Spectrum to  
Encourage Innovation in the  
Use of New Telecommunications  
Technologies

ET Docket No. 92-9

COMMENTS OF INTERACTIVE TECHNOLOGIES, INC.  
TO NOTICE OF PROPOSED RULE MAKING

Interactive Technologies, Inc. ("ITI"), by its attorneys, hereby submits these comments in the above-captioned rule making proceeding ("NPRM"). ITI supports the Commission's goal of modernizing its spectrum allocations to accommodate new and developing telecommunications technologies, particularly where there is substantial evidence of increased public demand. In the past, ITI and others in the alarm industry have urged similar modernization policies on behalf of the many users of RF-based life safety and security products. In connection with the examination of emerging technologies ITI again urges the Commission to consider carefully the growing demand and unique spectrum needs of life safety and security alarm users.

BACKGROUND

ITI is a leading manufacturer of RF-based life safety and security alarm devices used in homes and businesses. ITI's devices, which are regulated under the Commission's Part 15 Rules,

are deployed in both mobile and fixed applications as either stand-alone systems or in combination with wire-based technologies. In previous Commission rule makings, ITI has been an active participant offering comment and insight on the regulatory issues affecting these spectrum products.<sup>1/</sup>

Today, the wireless alarm industry exceeds \$400 million annually in retail sales and serves over one million residential and commercial customers nationwide who increasingly rely upon wireless products for their personal, medical and property protection. As a measure of the degree to which these products have become accepted in the American way of life, wireless alarm signalling is now governed by the National Fire Code in force in countless cities and communities across the country.

#### COMMENTS

Of historic and ever growing concern to the wireless alarm industry is the interference potential caused by other unlicensed emitters. In the past, Commission policy has been not to accord unlicensed devices any spectrum priority but rather to require all such products to operate on a "sufferance" basis. While ITI can appreciate the regulatory origins of this policy, it submits that such an archaic attitude fails to acknowledge the

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<sup>1/</sup> ITI has been a leading contributor in Commission Dockets 20990, 86-422, and 87-389, all of which involved amendments to the Part 15 security alarm regulations.

rapid transformation that has taken place in the wireless security alarm market in just the past few years.

From an industry that did not exist prior to 1980, the wireless alarm industry today provides substantial segments of the population with around-the-clock personal safety and property protection. As consumers and businesses continue to reap the benefits of this technology, the demand for better, more innovative and more reliable security offerings continues to climb.

Various proposals have been advanced in earlier Commission proceedings to create "protected" frequency bands for life safety and security devices<sup>2/</sup> or to allocate primary spectrum for their use on the same basis as accorded to other unlicensed products as industrial, scientific and medical ("ISM") devices.<sup>3/</sup> ITI's concern in this NPRM, therefore, is not so much with spectrum allocation<sup>4/</sup> as it is with the possibility that the Commission may be about to embark on a regulatory program that confers spectrum priority on certain classes of unlicensed products. It is ITI's understanding that proponents of personal communications services

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<sup>2/</sup> See Comments of ITI on Petition of SEIA for Partial Stay, FCC Docket No. 20990 (March 15, 1985); Comments of Security Equipment Industry Association in Gen. Docket No. 87-389 (March 7, 1988).

<sup>3/</sup> See 47 C.F.R. §18.101 et seq.

<sup>4/</sup> The 1.85 - 2.2 GHz band is not useful to wireless alarm devices because of the severe signal attenuation problems that exist at those frequencies. In addition, power consumption considerations of low power transmitters limit the use of battery-operated systems in these bands.

(PCS) and advanced cordless phones (CT-2) may be seeking interference protection from other types of emitters in this proceeding. While ITI has no objection to such proposals per se, it firmly believes that these issues must be addressed in the context of a broader rule making in which life safety and security alarm products are also given prime consideration for spectrum priority.

ITI urges the Commission, therefore, to consider carefully the public benefits that would flow from the establishment of a limited number of "protected bands" in which security and life safety devices would operate. A regulatory program of this sort could be modeled after one of several European spectrum allocations which accord security alarm devices spectrum rights over other licensed and unlicensed emitters. Because preferred frequency designations for security and life safety devices would improve their reliability for the benefit of the public without impinging on the operation of other emitters or increasing the threat of harmful interference to other spectrum users, ITI urges the Commission to undertake such an effort in a broad-based rule making proceeding.

#### CONCLUSION


In this proceeding, the Commission is proposing to accommodate newly emerging technologies in the personal radio field

in an effort to keep pace with similar developments in Europe and elsewhere. This is precisely the regulatory approach advanced by the wireless alarm industry in earlier proposals. ITI urges the Commission, therefore, to take a more expansive view of any preferential treatment that might be accorded to unlicensed "emerging technologies" and include life safety and security alarm products in any such deliberations.

Respectfully submitted,

**INTERACTIVE TECHNOLOGIES, INC.**

June 4, 1992



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